UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

BETTYE J. TURNER,

Plaintiff,

CASE NUMBER: 1:11-cv-5146-DLC

-against-

ZIMMER, INC.; ZIMMER HOLDINGS, INC.; WILSON/PHILLIPS HOLDINGS, INC. a/k/a ZIMMER WILSON PHILLIPS AND ZIMMER ORTHOPAEDIC SURGICAL PRODUCTS, INC.,

Defendants.

CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules Of Civil Procedure, the defendant, Zimmer Surgical, Inc. (f/k/a Zimmer Orthopaedic Surgical Products, Inc.), states it is a wholly-owned subsidiary of Zimmer, Inc. Zimmer, Inc., is a wholly-owned subsidiary of Zimmer Holdings, Inc., which is a publicly held corporation. No other publicly held corporation owns 10% or more of Zimmer Surgical, Inc., stock.

DATED: August 31, 2011 Respectfully submitted,

/s/ Phoebe A. Wilkinson

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Attorneys for the defendants, Zimmer Surgical, Inc. (f/k/a Zimmer Orthopaedic Surgical Products, Inc.), and Wilson/Phillips Holdings, Inc.

Of Counsel:

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing CORPORATE DISCLOSURE STATEMENT has been served via the Court's electronic filing system on the 31st day of August, 2011, upon the following counsel of record:

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/s/ Phoebe A. Wilkinson